



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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May 14, 2014

**BY ECF**

Honorable Debra Freeman  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Special Hagan v. City of New York, et al.  
Docket No.: 13 Civ. 1108 (JPO) (DCF)

Dear Judge Freeman:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendants in the above-captioned matter. As set forth more fully below, I write pursuant to the Court's Order dated February 13, 2014, directing the parties to submit by March 7, 2014 a proposed protective order covering confidential information that may be produced in discovery in this action (See Dkt. No. 31), as modified by the Court during the case management conference held on May 9, 2014.

Specifically, defendants respectfully submit that the scope of the protective order issued in this case, with respect to the definition of confidential information, should include the following:

(a) any documents or files maintained by any EEO office of any agency of the City of New York, and any materials that relate to or discuss any documents or files maintained by any EEO office of any agency of the City of New York including, but not limited to, any EEO documents or files obtained or copied by plaintiff during her employment by the City of New York; (b) any documents or files from the personnel records of any present or former employee of the City of New York, other than documents or files from plaintiff's own personnel records; (c) any documents or files, including sound recordings, maintained by any agency of the City of New York, including but not limited to the New York City Department of Investigation, relating to or discussing an investigation into the conduct of any potential, present or former employee of the City of New York; (d) any disciplinary documents or files maintained by any agency of the City of New York, relating to or discussing any present or former employee of the City of New York; and (f) the applications by persons other than plaintiff to positions in agencies of the City of New York.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Mario G. Frangiose

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cc: (by ECF)  
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